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Attorneys for Transportation Insurance Company

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

Transportation Insurance Company,

Plaintiff,

vs.

Central National Ins. Co. of Omaha, Pacific
Employers Insurance Company, and Acme
Trading Company of Portland

Defendants.

NO. 18-cv-00734-BR

PLAINTIFF'S ANSWER TO PACIFIC
EMPLOYERS INSURANCE
COMPANY AND THE CENTRAL
NATIONAL INSURANCE COMPANY
OF OMAHA'S COUNTERCLAIM

Plaintiff Transportation Insurance Company ("Transportation"), by and through its attorneys of record, answers The Counterclaim of Defendants Pacific Employers Insurance Company ("Pacific") and The Central National Insurance Company of Omaha ("Central National") as follows:

COUNTERCLAIM

(Declaratory Judgment)

1. Paragraph 1 of Pacific and Central National's counterclaim does not contain allegations requiring a response from Transportation. To the extent an answer is required, Transportation denies the allegations in paragraph 1.

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2. Transportation admits only that an actual and justiciable controversy exists with respect to the matters alleged in Transportations Complaint, and denies the remaining allegations in paragraph 2.

3. Transportation admits only that an actual and justiciable controversy exists with respect to the matters alleged in Transportations Complaint, and denies the allegation in paragraph 3.

PRAYER FOR RELIEF

A.–F. Transportation denies all of the allegations contained in Pacific and Central National's Prayer for Relief, and deny that they are entitled to the relief they seek.

AFFIRMATIVE DEFENSES

1. The Counterclaim fails to state claims for which relief may be granted.

DATED this 23rd day of July, 2018.

BETTS, PATTERSON & MINES, P.S.

By /s/ Jeremy Schulze

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system and the document is available for viewing and downloading from the CM/ECF system. I also certify that the foregoing document is being served electronically via the Court's CM/ECF notice system upon the following counsel of record::

***Counsel for Defendants Central National Insurance Company
of Omaha and Pacific Employers Insurance Company***

R. Lind Stapley, OSB No. 030531

Jillian Hinman, SOB No. 083623

1325 4th Ave

Suite 2000

Seattle, WA 98101

DATED this 23rd day of July 2018.

BETTS, PATTERSON & MINES P.S.

By /s/ Jeremy Schulze

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